

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

TYROME WILLIAM LOTT SR.,

Plaintiff,

v.

Civil Action No. 3:14cv45

MCH TRANSPORTATION CO., et al.

Defendants.

DEFENDANTS' PROPOSED VOIR DIRE

1. Have you or any member of your immediate family ever been involved in a motor vehicle accident in which someone was injured?

2. If so, were the injuries sustained by you or by some other member of your family?

3. Have you or any member of your immediate family ever been the plaintiff or the defendant in a lawsuit filed as a result of injuries sustained in an accident involving a tractor trailer or motor cycle?

4. Have you or any member of your immediate family ever been the plaintiff or the defendant in a lawsuit filed as a result of injuries sustained in an accident of any kind?

5. Has any member of the jury, or any immediate family member, ever been

treated by an physician of any kind as a result of a motor vehicle accident and, if so, why?

6. Has any member of the jury, or any immediate family member, ever served in the armed forces of the United States, if so what branch of the armed services and when?

7. Have you or any member of your immediate family ever been represented by the lawyers or their law firms?

8. Do you know or are you related by blood or marriage to any of the parties or witnesses in this case?

9. Have you seen or heard any advertising for the law firm representing the plaintiff and, if so, would that influence you in any way in this case?

10. If the defendants prove that the plaintiff was partially or entirely responsible for the accident in question, could you return your verdict for the defendants, even though the plaintiff claims he was injured?

11. We all feel sympathy for a person who says he has been injured. Does anyone feel that their sympathy or emotions will cloud their ability to render a fair and impartial verdict?

12. Do any of you feel that just because the plaintiff claims he was injured and filed a lawsuit, the defendants are automatically responsible for those injuries?

13. Does anyone feel that just because the plaintiff claims he was injured and filed a lawsuit, he is entitled to compensation for those injuries?

14. If you found that the plaintiff failed to prove that the defendants were negligent, would any of you hesitate to return a verdict for the defendants?

15. Do any of you know of anything that would prevent you from being fair and impartial to both sides; that is, do you know of anything about yourself that would prevent you from being fair?

16. Has any member of the jury ever been a juror on another case involving a claim of personal injury during this term?

MCH TRANSPORTATION CO. and HERSHIE
TYSON, Jr.

/s/

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CERTIFICATE

I hereby certify that on the 6th day of November, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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